

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)**

DAVID P. DONOVAN,

Plaintiff,

v.

BETH A. WILKINSON,

Defendant.

Civil Action No. 1:20-cv-1344-AJT-IDD

CONSENT MOTION FOR EXTENSION OF TIME

Plaintiff David P. Donovan (“Plaintiff”), with consent of Defendant Beth A. Wilkinson (“Wilkinson”) and Intervenor Pro-Football Inc.’s, d/b/a/ Washington Football Team (“Team”), pursuant to Local Rule 7 and the Court’s November 25, 2020 Order (ECF 68), respectfully requests that the Court extend the deadline for all parties to file objections pursuant to Federal Rule of Civil Procedure 72(a), or seek other appropriate relief, if any, related to the Court’s November 25, 2020 Order (“Sealing Order”) until: (1) ten days after the parties have submitted to the Clerk of Court, to be placed on the public docket, redacted versions of all currently sealed filings to replace the versions of those documents previously filed under seal; or (2) ten days after the Court issues a ruling on any disputes concerning redactions that may be raised by any party or intervenor, whichever is later. In support of this consent motion, Plaintiff states as follows:

1. Pursuant to Federal Rule of Civil Procedure 72(a), “[a] party may serve and file objections to [an] order within 14 days after being served with a copy.” Accordingly, the deadline for Plaintiff and Wilkinson to file objections, if any, to the Sealing Order was originally December 9, 2020.

2. On December 9, 2020 the Court granted a consent motion to extend that deadline for one week to December 16, 2020 to allow time for the Team to intervene to assert privileges and privacy interests related to matters that were the subject of the Sealing Order. (ECF 76.)

3. Later in the day on December 9, 2020, the Court issued another order granting the Team's motion to intervene and ordering the parties and the Team to submit the redacted documents to the Court pursuant to the Sealing Order by December 17, 2020. (ECF 84.)

4. Since December 9, 2020, the parties and the Team have been meeting and conferring in good faith to reach agreement on application of redactions to the sealed materials under the Sealing Order. On Monday, December 14, 2020, counsel for all parties and the Team had a telephonic meet and confer during which they discussed, among other things, the December 16, 2020 deadline for objections to the Sealing Order. All parties agreed that a further extension should be sought and that objections, if any, would be more efficiently presented after the redacted documents are submitted to the Court and any remaining disputes about redactions, to the extent there are any, are resolved by the Court.

5. There is good cause for the relief sought by this Motion because the ongoing meet and confer process may moot the potential for any party desiring to file objections to the Sealing Order, and filing of adversarial objections to the Sealing Order prior to the parties and the Team completing the redaction process in accordance with the December 17, 2020 deadline for submitting redactions to the Clerk.

6. Accordingly, Plaintiff, with the consent of Defendant and the Team, respectfully requests that the Court extend the deadline to file objections pursuant to Federal Rule of Civil Procedure 72(a) until either: (1) ten days after the parties and the Team have submitted to the Clerk of Court, to be placed on the public docket, redacted versions of all currently sealed filings; or (2)

ten days after the Court issues a ruling on any disputes concerning redactions that may be raised by any party or the Team, whichever is later. A proposed order is filed herewith.

**THE PARTIES CONSENT TO SUBMISSION OF THIS MOTION
TO THE COURT WITHOUT A HEARING.**

Respectfully submitted, this 15th day of December, 2020,

/s/ Cathy A. Hinger

Cathy A. Hinger (VSB No. 46293)
Lela M. Ames (VSB No. 75932)
Claire J. Rauscher (Admitted Pro Hac Vice)
Ana L. Jara (Admitted Pro Hac Vice)
WOMBLE BOND DICKINSON (US) LLP
1200 Nineteenth Street, N.W.
Suite 500
Washington, DC 20036
Telephone: 202-857-4489
Facsimile: 202-261-0029
Email: cathy.hinger@wbd-us.com
Email: lela.ames@wbd-us.com
Email: claire.rauscher@wbd-us.com
Email: ana.jara@wbd-us.com

Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of December, 2020, a true and correct copy of the foregoing motion was filed with the Clerk of Court using the CM/ECF system, which will send a notification of such filing to all counsel of record.

/s/ Cathy A. Hinger
Cathy A. Hinger, Esq.